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August 24, 2022

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

BY ECF
Letter Motion, on Consent

RE: United States v. Maurice Hartley, 18 Cr. 390 (PAE)

Your Honor:

I represent Maurice Hartley in the above-referenced case.

I am writing to request an extension of several days, until this Friday (August 26, 2022) to file a sentencing memorandum (which I now realize was scheduled for a day ago) on behalf of my client.

We just finished up our final conferences with the government regarding this case and I wanted to see the outcome of those before drafting a sentencing memorandum. In addition, seeing my client at the facility in which he is housed (in New Jersey) has been somewhat difficult.

Because of the recommendation made by the Probation Department in their updated report (see page 31 of the revised final PSR) I do not wish to push the actual sentencing hearing date back. I am hoping that the memorandum I submit is not so complex as to require much time for review by the Court and the government. If, however, a change of the sentencing date is necessary I would consent, and only ask that it be for as brief a period as possible.

I have communicated with AUSA Christopher Brumwell about this request and he has no objection.

I thank the Court very much for the Court's attention to this request.

Sincerely,

/s/ Thomas H. Nooter
THOMAS H. NOOTER
Attorney for Defendant Hartley

cc: AUSA Christopher Brumwell, Esq., by ECF

GRANTED. Counsel may file the sentencing submission today, August 29, 2022.
The Clerk of Court is requested to terminate the motion at Dkt. No. 575.

8/29/2022

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge